

United States Courts
Southern District of Texas
FILED

MAY 08 2019

David J. Bradley, Clerk of Court

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

VS.

OLUWASEGUN LUKUMAN ADEKUNLE
OLUWAKEMI LEE ADEYEMI
FATIMAT OLA IDRIS
KRYSTLE MUKOSOLU McGILL
AMANDA MUKOSOLU OKPALA

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CRIMINAL NO. H-19-

19 CR 333

INDICTMENT

The United States Grand Jury charges:

At all times material herein:

1. The Federal Deposit Insurance Corporation (FDIC) was an agency of the Federal government which insured the deposits of member banks against loss up to \$100,000 with the purpose of preventing their collapse and instilling public confidence in the nation's banking institutions.
2. Bank of America, including its branches, was a financial institution the deposits of which were insured by the FDIC.
3. BB&T Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.
4. Capital One Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.
5. Chase Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.

6. Compass Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.

7. Fifth Third Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.

8. Hanmi Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.

9. PNC Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.

10. SunTrust Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.

11. Wells Fargo Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.

12. Woodforest National Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.

COUNT 1
(Conspiracy - 18 U.S.C. §1349)

A. INTRODUCTION

1. The Grand Jury adopts, re-alleges, and incorporates herein the allegations in paragraphs 1-12 of the Introduction of this Indictment as if set out fully herein.

B. THE CONSPIRACY AND ITS OBJECTS

2. From on or about January of 2017 and continuing until on or about September 21, 2018, in the Houston Division of the Southern District of Texas and elsewhere,

**OLUWASEGUN LUKUMAN ADEKUNLE,
OLUWAKEMI LEE ADEYEMI,
FATIMAT OLA IDRIS,
KRYSTLE MUKOSOLU McGILL, and
AMANDA MUKOSOLU OKPALA,**

Defendants herein, did knowingly and willfully combine, conspire, confederate, and agree with others known and unknown to the Grand Jury to execute and attempt to execute a scheme and artifice to defraud Bank of America, BB&T Bank, Capital One Bank, Chase Bank, Compass Bank, Fifth Third Bank, Hanmi Bank, SunTrust Bank, PNC Bank, Wells Fargo Bank, and Woodforest National Bank, financial institutions the accounts of which were insured by the FDIC, and to obtain money, funds, and property under the custody and control of the above-listed financial institutions, by means of false and fraudulent pretenses, representations, and promises in violation of Title 18, United States Code, Section 1344 (Bank Fraud);

C. THE MANNER AND MEANS OF THE CONSPIRACY

The manner and means of the conspiracy were as follows:

3. The conspirators agreed to engage in counterfeit check, business email compromise (BEC) and credit card schemes to defraud financial institutions.

4. The conspirators obtained fraudulent and counterfeit passports in different names purporting to be from various countries such as the Federal Republic of Nigeria and the Republic of France.

5. The conspirators obtained addresses to use in the scheme by renting mailboxes with the fraudulent passports.

6. The conspirators opened bank and credit card accounts using the fraudulent passports and the mailbox addresses.

7. The conspirators used the debit and credit cards from the bank accounts to withdraw cash and purchase merchandise.

8. The conspirators filed false claims with the banks and credit card companies contesting their fraudulent charges to obtain a refund and inflate the balance of the accounts.

9. The conspirators further inflated the balance of the credit card accounts by applying fraudulent payments to the accounts. For example, the conspirators would apply fraudulent electronic payments to the bank and credit card accounts. The electronic payments would be returned as unpaid, usually within a week, but the conspirators would submit a new electronic payment prior to the older payment being returned, enabling them to continue to use the card for spending and cash advances.

10. The conspirators deposited stolen, counterfeit and forged checks into the bank and credit card accounts.

11. The conspirators used the bank accounts to receive funds from Business Email Compromise (BEC) schemes. These are schemes in which an email is sent to a business pretending to be a vendor of the business and unlawfully requesting payment. After the proceeds of the BEC scheme were received, the conspirators attempted to conceal the funds further by conducting financial transactions.

12. The conspirators used the bank accounts to deposit money orders obtained by credit card fraud.

13. The conspirators caused the financial institutions to mail debit and credit cards to addresses that they controlled.

14. Defendant Oluwasegun Lukuman Adekunle was at all times during this conspiracy on pretrial release in accordance with the terms and conditions of Title 18, United States Code, Section 3142, in case number 16-CR-230, United States v. Adekunle, in the United States District Court for the District of Columbia, in violation of Title 18, United States Code, Section 3147.

D. OVERT ACTS

15. In furtherance of the conspiracy, and to effect the objects thereof, the defendants performed and caused to be performed, among others, the overt acts set forth in Counts Three through Fifteen of this indictment, as well as Overt Acts a-i set forth in Count Two, all hereby re-alleged and incorporated as if fully set forth in this Count of the indictment. They also opened commercial mailboxes as described in the overt acts listed below:

OVERT ACT	DATE	NAME	COUNTRY OF PASSPORT	ADDRESS
A	February 6, 2018	Theresa Unigwe	Republic of France	9490 FM 1960 Bypass W. #321, Humble, Texas 77338
B	April 30, 2018	Luqman Wahidi Mohammed	Republic of Nigeria	3915 W. Davis, #130-246, Conroe, Texas 77304
C	May 25, 2018	Maria Felicia Ugwu	France	3915 W. Davis, #130-246, Conroe, Texas 77304
D	June 6, 2018	Adeyemi Lee	South Africa	3665 East Bay Dr., #204-199, Largo, Florida 33771
E	July 19, 2018	Ashley Eze	Nigeria	10223 Broadway Street, #P397, Pearland, Texas 77584

In violation of Title 18, United States Code, Sections 1349 and 3147.

COUNT 2
(Conspiracy to Launder Funds - 18 U.S.C. §1956(h))

A. INTRODUCTION

1. The allegations in paragraphs 1-12 of the Introduction of this Indictment are hereby adopted, re-alleged, and incorporated as if set out fully herein.

B. THE CONSPIRACY AND ITS OBJECTS

2. Beginning on or about January of 2017, and continuing through at least September 21, 2018, in the Houston Division of the Southern District of Texas, and elsewhere,

**OLUWASEGUN LUKUMAN ADEKUNLE,
OLUWAKEMI LEE ADEYEMI,
FATIMAT OLA IDRIS,
KRYSTLE MUKOSOLU McGILL, and
AMANDA MUKOSOLU OKPALA,**

Defendants herein, together with other persons known and unknown to the grand jury, did unlawfully and knowingly combine, conspire, confederate, and agree with others, to conduct financial transactions which involved proceeds of a specified unlawful activity, that is, acts chargeable as wire fraud under Title 18, U.S.C. §1343, and knowing that the transactions were designed in whole or in part to promote the carrying on of such specified unlawful activity, and to conceal and disguise the nature, source, ownership and control of the proceeds of specified unlawful activity, all in violation of Title 18, United States Code, Section 1956(a)(1)(A)(I) and (B)(I).

C. THE MANNER AND MEANS OF THE CONSPIRACY

3. Among the manner and means by which the defendant sought to accomplish and did accomplish the purpose of the scheme to defraud are the acts set forth in paragraphs 3 through 14 of Count One of this Indictment, hereby re-alleged and incorporated as if fully set forth in these counts.

D. OVERT ACTS

4. In furtherance of the conspiracy, and to effect the objects thereof, the defendants and the co-conspirators performed and caused to be performed, in the Southern District of Texas and elsewhere, among others, the overt acts alleged below:

- a. On or about August 11, 2017 a cashier's check in the amount of \$85,000 was paid from the Krenecia Hogan account at Bank of America.
- b. On or about January 3, 2018 a cashier's check in the amount of \$78,850.54 was paid from the account of Sandra Jenkins at Bank of America.
- c. On or about January 3, 2018 a wire transfer in the amount of \$118,832.10 from the account of Sandra Jenkins at Bank of America.
- d. On or about May 29, 2018 a check in the amount of \$9,980.00 was issued from the account of Lee Adeyemi and BB&T Bank.
- e. On or about May 29, 2018 a check in the amount of \$9,950.00 was issued from the account of Lee Adeyemi and BB&T Bank.
- f. On or about May 29, 2018 a check in the amount of \$4,900.00 was issued from the account of Lee Adeyemi and BB&T Bank.
- g. On or about May 29, 2018 a check in the amount of \$4,800.00 was issued from the account of Lee Adeyemi and BB&T Bank.

h. On or about May 29, 2018 a check in the amount of \$9,900.00 was issued from the account of Lee Adeyemi and BB&T Bank.

i. On or about May 29, 2018 a check in the amount of \$4,980.00 was issued from the account of Lee Adeyemi and BB&T Bank.

In violation of Title 18, United States Code, Section 1956(h).

COUNTS 3-15
(False Use of a Passport – 18 U.S.C. §§ 1543 and 2)

From on or about January of 2017 until on or about September 21, 2018, in the Houston Division of the Southern District of Texas,

**OLUWASEGUN LUKUMAN ADEKUNLE,
OLUWAKEMI LEE ADEYEMI,
FATIMAT OLA IDRIS,
KRYSTLE MUKOSOLU McGILL, and
AMANDA MUKOSOLU OKPALA,**

Defendants herein, aiding and abetting each other, did then and there willfully and knowingly use and attempt to use forged and counterfeit passports to open bank accounts as described in the Counts below, and the Defendants knew said passports were forged, counterfeit, or otherwise unlawfully procured:

COUNT	DATE	ALIAS USED	TRUE NAME	COUNTRY OF PURPORTED ISSUE	BANK
THREE	June 15, 2017	Sylvester Anthony Zouma	Oluwasegun Lukuman Adekunle	Great Britain	Chase
FOUR	July 7, 2017	Mohammed Luqman	Oluwasegun Lukuman Adekunle	Portugal	Wells Fargo

FIVE	August 11, 2017	Theresa Unigwe	Amanda Okpala	Republic of France	Wells Fargo
SIX	December 19, 2017	Leonardo Mark Cole	Oluwasegun Lukuman Adekunle	Republic of France	Wells Fargo
SEVEN	December 19, 2017	Felicia Arese Ugwu	Amanda Okpala	Republic of South Africa	BB&T
EIGHT	January 17, 2018	Rosario Camille Johnson	Fatimat Idris	Belgium	Wells Fargo
NINE	March 7, 2018	Mary Theresa Unigwe	Fatimat Idris	Belgium	Compass
TEN	March 27, 2018	Luqman Wahidi Mohammed	Krystle McGill	Federal Republic of Nigeria	PNC
ELEVEN	April 16, 2018	Rosario Johnson	Krystle McGill	Federal Republic of Nigeria	Chase
TWELVE	May 25, 2018	Maria Felicia Ugwu	Fatimat Idris	Republic of France	Compass
THIRTEEN	June 29, 2018	Ashley Phillips Luqman	Krystle McGill	Federal Republic of Nigeria	Compass
FOURTEEN	July 3, 2018	Luqman Ashley Phillips	Oluwakemi Adeyemi	Federal Republic of Nigeria	Well Fargo
FIFTEEN	July 9, 2018	Ashley Eze	Oluwakemi Adeyemi	Federal Republic of Nigeria	Wells Fargo

In violation of Title 18, United States Code, Section 1543 and 2.

COUNT 16
(Assaulting a Federal Officer - 18 U.S.C. §111(a)(1))

On or about September 21, 2018 in the Houston Division of the Southern District of Texas,

OLUWAKEMI LEE ADEYEMI,

Defendant herein, did then and there forcibly assault, impede, oppose and resist Matthew S. Boyden, a United States Postal Inspector engaged in the performance of his official duties, by intentionally using forcible physical contact such as biting, punching and kicking Inspector Boyden.

In violation of Title 18, United States Code, Section 111(a)(1).

NOTICE OF FORFEITURE
(18 U.S.C. § 982(a)(6))

Pursuant to Title 18, United States Code, Section 982(a)(6), the United States gives notice to the defendants,

**OLUWASEGUN LUKUMAN ADEKUNLE,
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that in the event of conviction of the offenses charged in Counts Two through Six of this Indictment, the United States intends to seek forfeiture of all conveyances used in and of all property used to facilitate, or intended to be used to facilitate, the commission of the offenses.

Property Subject to Forfeiture

Defendants are notified that the property subject to forfeiture includes, but is not limited to, the following personal property: \$20,000.00 in U.S. dollars seized on or about September 21, 2018, from **OLUWAKEMI LEE ADEYEMI**.

Money Judgment and Substitute Assets

The United States gives notice that it will seek a money judgment against each defendant. In the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exist, the United States will seek to forfeit any other property of the defendants up to the value of the property subject to forfeiture.

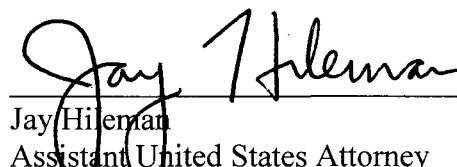
TRUE BILL

Original Signature on File

FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK
United States Attorney

By:



Jay Hileman
Assistant United States Attorney
(713) 567-9391